

Lars Evensen
Nevada Bar No. 8061
J. Malcolm DeVoy
Nevada Bar No. 11950
HOLLAND & HART LLP
9555 Hillwood Drive
Second Floor
Las Vegas, NV 89134
Telephone: 702-669-4600
lkevensen@hollandhart.com
jmdevoy@hollandhart.com

*Attorneys for Defendants
Juan Rivas; ADT LLC of Delaware; and
Johnson Controls Security Solutions LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDYTHE MAXINE HARTMAN, a Nevada
resident,

Plaintiff,

vs.

JUAN RIVAS, a Nevada resident; **UTC
FIRE & SECURITY AMERICAS
CORPORATION, INC.**, d/b/a
INTERLOGIX, a corporation; **ADT LLC OF
DELAWARE**, d/b/a **ADT**, a foreign limited
liability company; **JOHNSON CONTROLS
SECURITY SOLUTIONS LLC**, a foreign
limited liability company; **ROE
MANUFACTURER**; **ROE COMPONENT
PARTS MANUFACTURER**; **ROE
DISTRIBUTOR**; **ROE ADT SECURITY
DEALER**; **ROE ADT PRODUCT
INSPECTOR**; **ROE ADT PRODUCT
DESIGNER**; **DOES 1-20**; and **ROE
BUSINESS ENTITIES 1-20**, inclusive,

Defendants.

CASE NO. 2:20-cv-01968-JCM-DJA

**DEFENDANTS JUAN RIVAS,
UTC FIRE & SECURITY AMERICAS CORPORATION, INC.,
ADT LLC OF DELAWARE, AND
JOHNSON CONTROLS SECURITY SOLUTIONS LLC'S STIPULATION FOR AN
EXTENTION OF TIME TO FILE FIRST RESPONSIVE PLEADING**

[FIRST REQUEST]

1 The parties hereby stipulate and agree to a 50-day extension of time for Defendants Juan Rivas
2 (“Mr. Rivas”); UTC Fire & Security America Corporation, Inc., d/b/a Interlogix (“UTC/Interlogix”);
3 ADT LLC of Delaware (“ADT”); and Johnson Controls Security Solutions LLC (“JCSS”) to each file
4 their respective responsive pleading responsive to the Complaint [ECF 1-1], and respectfully request
5 that the Court approve the parties’ stipulation for the following reasons:

6 1. Plaintiff Edythe Maxine Hartman (“Plaintiff”) filed her Complaint on September 18,
7 2020 in the Eighth Judicial District Court in and for Clark County, Nevada, Case No. A-20-821415-C.

8 2. ADT and JCSS filed their Notice of Removal on October 23, 2020 [ECF 1], making
9 their responsive pleadings to the Complaint due on October 30, 2020 under Federal Rule of Civil
10 Procedure 81(c)(2)(C).

11 3. Counsel for Plaintiff is in the process of determining whether to join additional, and
12 potentially indispensable, parties and modify the caption to identify the proper parties in interest.
13 Additionally, counsel for JCSS has requested that it be dismissed from the action on the grounds that
14 it is an improper party and has no business relationship with the Plaintiff. These issues are currently
15 under examination and determination.

16 Counsel for Plaintiff and Defendants therefore respectfully request that the Court approve the
17 parties’ stipulation for a 50-day extension, allowing Mr. Rivas, UTC/Interlogix, ADT, and JCSS, to
18 respond to the Complaint on or before Thursday, December 17, 2020.

19 This is the parties’ first request for an extension of the responsive pleading deadline in this
20 action. The parties have requested a 50-day extension in order to avoid seeking subsequent extensions
21 from the Court. Additionally, based on the potential changes in party composition under
22 consideration since ADT and JCSS appeared in this action, this extension promotes judicial efficiency
23 and conserves party resources by allowing the addition, subtraction, or substitution of parties to be
24 determined before responsive pleadings and potential dispositive motion practice commences. The
25 parties seek this extension in good faith and in consideration of the following premises, and not for the
26 purposes of delay.

27 //

RESPECTFULLY SUBMITTED this 30th day of October, 2020.

By: /s/ Breanna K. Hartmann

James D. Urrutia
Breanna K. Hartmann
MAINOR WIRTH, LLP
6018 South Apache Road
Suite 150
Las Vegas, NV 89148
Telephone: 702-464-5000
Facsimile: 702-463-4440
james@mwinjury.com
bree@mwinjury.com

*Attorneys for Plaintiff
Edythe Maxine Hartman*

By: /s/ J. Malcolm DeVoy

Lars Evensen
Nevada Bar No. 8061
J. Malcolm DeVoy
Nevada Bar No. 11950
HOLLAND & HART LLP
9555 Hillwood Drive
Second Floor
Las Vegas, NV 89134
Telephone: 702-669-4600
lkevensen@hollandhart.com
jmdevoy@hollandhart.com

*Attorneys for Defendants
Juan Rivas; ADT LLC of Delaware; and
Johnson Controls Security Solutions LLC*

By: /s/ Rebecca Mastrangelo

Nevada Bar No. 5417
Rebecca Mastrangelo
ROGERS, MASTRANGELO, CARVALHO
& MITCHELL
700 South Third Street
Las Vegas, NV 89101
Telephone: 702-383-3400
Facsimile: 702-384-1460
rmastrangelo@rmcmlaw.com

*Attorneys for Defendant
UTC Fire & Security America Corporation,
Inc., d/b/a Interlogix*

ORDER

In light of the foregoing and upon a finding of good cause, it is hereby **ORDERED** that the deadline for defendants Mr. Rivas, UTC/Interlogix, ADT, and JCSS, to answer or otherwise respond to the Complaint [ECF No. 1-1] shall be by or before Thursday, December 17, 2020.

IT IS SO ORDERED.

DATE: November 2, 2020



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE